

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

BRIAN WALLENBERG,	)	
	)	Case No. 4:23-mc-332
Petitioner,	)	
	)	
v.	)	
	)	
PJ UTAH, LLC,	)	
	)	
Respondent.	)	

**INTERROGATORIES DIRECTED TO GARNISHEE**

TO: JP Morgan Chase  
7700 Forsyth Blvd., Suite 1200  
St. Louis, MO 63105

Note: This garnishment is directed to any and all property belonging to and assets of Respondent and Judgment Debtor PJ Utah, Inc., d/b/a "Papa Johns," including, but not limited to, JP Morgan Chase account # xxxxx0756 and any and all depository accounts held in the name of or for the benefit of PJ Utah, LLC d/b/a "Papa Johns," any income or debts due to said Respondent and Judgment Debtor, and any other property of whatever type belonging to said Respondent and Judgment Debtor individually or jointly with any other person or entity, which is in your custody or control, and which is subject to garnishment.

INSTRUCTIONS: You are to answer interrogatories UNDER OATH within ten (10) days after the return date of the writ, mail the ORIGINAL to:

Clerk, United States District Court  
111 South 10th Street  
St. Louis, MO 63102

and mail COPIES to the attorneys for the Judgment Creditor listed below:

Mark Potashnick  
Weinhaus & Potashnick  
11500 Olive Blvd., Suite 133  
St. Louis, MO 63141

Comes now Petitioner and Judgment Creditor Brian Wallenberg, pursuant to Rule 69 of the Federal Rules of Civil Procedure, and exhibit the following interrogatories to be answered by the Garnishee, under oath, within ten (10) days of the returnable date.

1. At the time of service of the garnishment, had you, or have you since that time had, or have you now in your possession, custody, or charge, any goods, chattels, monies, credits or effects belonging to the Respondent and Judgment Debtor PJ Utah, LLC, individually or jointly with any other person or entity? If so, state what they were or are, their value, and identify each joint or co-owner, and attach copies of any document reflecting the identity and/or ownership of any such goods, chattels, monies, credits or effects to your answer.

Answer:

2. At the time of service of the garnishment, were you, or have you since become, or are you now in any way, indebted to the Respondent and Judgment Debtor PJ Utah, LLC? If your answer is "yes," state to what extent and in what manner the debt accrued, and if evidenced by any instrument in writing, describe the same and state what has become of the same and under whose custody it is held, and attach a copy of this instrument to your answer.

Answer:

3. At the time you were summoned as Garnishee, or since that time, have you become, or are you now bound under any contracts to pay the Respondent and Judgment Debtor PJ Utah, LLC directly or to any other party on account of Respondent and Judgment Debtor, any monies which are not yet due? If your answer is “yes,” state the nature of said contract, the names of the contracting parties, the amount of money to become due thereunder, when the same was or is due and payable, exactly to whom the money is due and attach a copy of said contract to your answer.

Answer:

4. Have you paid to Respondent and Judgment Debtor PJ Utah, LLC or to anyone acting as its agent, or to anyone in its behalf, or to anyone on account of Respondent and Judgment Debtor PJ Utah, LLC, any money, property or effects since the time the garnishment summons herein was served on you? If your answer is “yes,” state when the same was paid, the amount and nature of said payment and to whom it was paid, in what capacity the recipient received it and if paid under the terms of a contract, attach a copy of said contract.

Answer:

March 31, 2023

Respectfully submitted,

**WEINHAUS & POTASHNICK**

/s/ Mark Potashnick

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